Supreme Court, U.S.
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NO. 92-1091

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1992

CLARENCE H. HOLDING, d/b/a
CLARENCE H. HOLDING & COMPANY,
Petitioner,

v.

LEWIS W. BROTHERS, JR., ET AL.,
Respondents.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT OF VIRGINIA

REPLY BRIEF

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EDITOR'S NOTE

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IN THE

SUPREME COURT OF THE UNITED STATES OF AMERICA

CLARENCE H. HOLDING , CLARENCE H. HOLDING & COMPANY ,
PETITIONER,

V.

LEWIS W. BROTHERS, JR., MAX ZOECKLER, JOHN W. PARTHUM,
BRIAN SILVERMAN, MADELINE T. WATTS. RESPONDANTS.

TO THE HONORABLE JUSTICES OF THE SUPREME COURT.

REPLY BRIEF

COMES NOW PETITIONER , CLARENCE H HOLDING , CLARENCE H. HOLDING & COMPANY BY COUNSEL PROSE AND PRESENTS HIS REPLY BRIEF PURSUANT TO RULE 15 SEC. .6 OF THE RULES OF THE SUPRE ME COURT OF THE U.S. OF AMERICA. IN WASHINGTON, D.C. ASK FOR JUDGMENT ON ALL COUNTS.

THE BRIEFS IN OPPOSITION ARE INCORRECT, FALSE, ERRONEOUS, WITHOUT, WITHOUT MERIT, WITHOUT FOUNDATION, BOLD FACE LYING BY THEIR COUNSELS.

THE RESPONDANTS, BROTHERS, ZOECKLER, PARTHUM , SILVERMAN, WATTS COUNSELS STATE IN THE OPINIONS BELOW, THE SEPTEMBER 18, 1992, ORDERS OF AUGUST 14,1992 (3) , MARCH ,1992 OF THE SUPRE ME COURT OF VIRGINIA ARE NOT AND WILL NOT BE REPORTED . THE NOVEMBER 13,1991, DECEMBER 12, 1991, MARCH 6, JANUARY 6,1992 ORDERS OF THE CIRCUIT COURT OF WESTMORELAND COUNTY , VIRGINIA ARE NOT(WILL NOT) BE REPORTED.

MR. HOLDING WAS NOT NOTIFIED OR ADVISED THE ORDERS WOULD NOT BE REPORTED. THE ORDERS OF BOTH COURTS ARE OF RECORD AND ARE

REQUIRED TO BE REPORTED, INDEXED, PRINTED, FILED, FOR THE RECORD BY LAW, BY RULES OF THE SUPREME COURT, THE CONSTITUTION OF VIRGINIA. SO IF ANYONE NEEDS TO REFER OR REVIEW OR APPEAL THEY WILL BE EASILY LOCATED IN BOUND VOLUMES .

COUNSEL PECK IS ALSO COUNSEL FOR THE STATE CORPORATION COMMISSION OF VIRGINIA AS WELL FOR BROTHERS, ZOECKLER , PARTHUM, SILVERMAN, THE RESPONDANTS , WHO ARE MEMBERS OF THE STATE CORPORATION COMMISSION SECURITIES DIVISION .

COUNSEL PECK CONFRONTS ONLY 1 OF THE QUESTIONS PRESENTED BY THE PETITIONER , WHERE THERE ARE 7 QUESTIONSS VERY, VERY IMPORTANT LEGAL QUESTIONS PRESENTED BY RHE PETITIONER. SHE IGNORED THE OTHER 6 QUESTIONS. VERY CLEARLY AND CONCISELY STATED. THESE ARE NOT CONFRONTED BY HER BRIEF IN OPPOSITION.

BROTHERS, ZOECKLER, PARTHUM , SILVERMAN BY CPUNSEL JOEL PECK ADVOIDED THE FOLLOWING QUESTIONS ENUNERATED BELOW AS FOLLOWS: 1. JURY TRIAL WAS DEMANDED FROM THE BEGINNING BY PLEADINGS AND IN THE COURT WHICH IS A CONSTITUTIONAL RIGHT GUARANTEED BY THE 7th AMENDMENT OF THE U.S. CONSTITUTION. . THIS RIGHT IS PARMOUNT AND CANNOT BE DENIED, BUT WAS IN THE CIRCUIT COURT OF WESTMORELAND COUNTY VIRGINIA. 2. CONFLICT OF INTERESTS , WHICH IS A PARMOUNT QUESTION ENVLOVES THE JUSTICES OF THE SUPREME COURT OF VIRGINIA , THE LAWS, THE CONSTITUTION,RULES OF THE SUPREME COURT OF VIRGINIA , THIS S , OATH TAKING, RESPONSIBILTY, JUSTICE, INTEGRITY, FITN ESS FOR JUSTICE OF THE SUPREME COURT OF VA, MORAL , FAIR

TRIAL , DUE PROCESS LAWS RIGHTS. 3.PECK AVOIDED ANOTHER VERY VERY IMPORTANT QUESTION CLEARLY AND CONCISELY SET FORTH THE THE TRIAL COURT JUDGE , BIAS, PREJUDICES, FAIR TRIAL , PRO DEFENDANTS IN EVERY ORDER HE MADE 12/12/91, 1/6 /92. 3/6 /92. VIOLATED DUE PROCESS RIGHTS. 4. PECK AVOIDED THE QUESTION OF WITNESSES, LACK OF FACT FINDING, TESTIMONY NONE, DECISIONS REACHED ONLY BY PLEADINGS OF COUNSEL WHICH ARE OF NO VALUE. NEED MORE THAN THAT , LACK OF INTEGRITY OF THE COUNSELS OF WATTS6 JOHN WARE, BROTHERS ET AL , COUNSEL MCKENNEY IN WRITING THE ORDERS . 5. CONSPIRACY OF THE DEFENDANTS UNDER SEC 18.2-499, 18.2-500 Of THE CODE OF VA.SET FORTH IN THE ORIGINIAL AFFIDAVIT AND MOTION FOR JUDGMENT AND DAMAGES ON SEPTEMBER 3, 1991.THICH CAUSED UNTOLD PERMANENT IRREPARABLE PERSONAL INJURIES AND INJURIES TO PROPERTIES, BUSINESSES, ESTATES, PERSONALTY AND INTEGRITY , CHARACTER. FOR 72 YEARS AND 43 YEARS OWNER AND OPERATOR OF A BROKERAGE SECURITIES WITH OUT A SINGLE COMPLAINT. 6 . AVOIDED SEC 8.01 271.1 OF THE CODE OF VA. WHERE TWO FALSE AWARDES OF $250, $500 WEERE MADE IN THE TRIAL CT. 6. AVOIDDED SEC 8.01-243 OF CODE OF VA. BASIS OF THIS ACTION FOR PERSONAL INJURIES AND INJURY TO PROPERTIES ± PERSONAL INJURIES CARRY 2 YR. STATUTE OF LIMITATIONS AND INJURY TO PROPERTIES CARRY A 5 YEARD STATUTE OF LIMITATIONS .WHERE GROSS PERSONAL INJURIES AND GROSS INJURIES TO PROPERTIES, BUSINESSES , ESTATES, INTEGRITY,

PERSONALITY ARE PERMANENT , IRREPARABLE CAN NOT BE FIXED OR REPAIRED WERE SUSTAINED

ON SEPTEMBER 2, 1989 , BROTHERS, ZOECKLER, PARTRHM, SILVERMAN , AND WATTS IN A WELL PLANNED CONSPIRACY DID IN COLLUSION DELIBERATELY , INTENTIONALLY , GOING TO GREAT LENGTHS BY THEIR WRONGFUL , UNLAWFUL ACTS WENT DOWN TO COMMONWEALTH ATTORNEY GARRATT AND LIEUTENANT CLARKE OF THE ESSEX COUNTY AND LIED TO THEM AND HAD MR. HOLDING ARRESTED ON A $10,000 EMBEZZLEMENT CHARGE FROM WATTS WHEN MR. HOLDING WAS IN THE HOSPITAL WITH HEART TROUBLE AND HERNIA STRANGULATION. JUDGE HYDE DISMISSED THE CHARGE ON JANUARY 11, 1990 . MR. HOLDING SUFFERED GREAT IRREPARABLE PERMANENT PERSONAL INJURIEIS AND INJURIES TO HIS PROPERTIES BUSINESSES , ESTATES, TRADE, PERSONALTTY. INTEGRITY IMPECCABLE FOR 72 YEARS AND CHARACTER .

THE MOTION FOR JUDGMENT AND DAMAGES FOR INJURIES AND THE PERSONAL AFFIDAVIT OF MR. HOLDING SETS FORTH VERY VIVIDLY, VERY CLEARLY AND CONCISELY THE ACTION FOR PERSONAL INJURIEIS AND INJURIES TO PROPERTIES, BUSINESSES, ESTATES, TRADE , INTEGRITY AND CHARACTER . WHICH CODE 8.01-243 SEC OF Va GOVERNS THE TIME FOR FILING AN ACTION .WHATEVER THE THEORY OF THE ACTION FOR INJURIES -2 YRS. PERSONAL INJURIES AND 5 YEARS INJURIES TO PROPERTIES OF ALL KIND .

DUE TO A CONFLICT OF INTEREST VIOLATIONS , ALSO VIOLATED DUE PROCESS RIGHTS BY THE INTENTIOAL , DELIBERATE ACTIONS OF CONFLICT /OF INTEREST BY JUSTICE ELIZABETH LACY , HER ASSOCIATE

JUSTICES , A CHRISTIAN COMPTON , RICHARD H. POFF, CHIEF JUSTICE LARRY L. CARRICO SITTING IN QUORUM AT A HEARING OF CASE OF HOLDING VS BROTHERS, ZOECKLER, PARTHUM, SILVERMAN , AND WATTS ON JULY 30, 1992 AND ON JULY 29, 1992 AND 3 OTHER ORDERS AUGUST 14,1992, 1 SEPTEMBER 18, 1992, 1 MARCH 17, 1992.ALSO CAUSED VIOLATION OF DUE PROCESS RIGHTS OF MR. HOLDING. MR. HOLDING CALLED ATTENTION TO THE COURT OF EXISTENCE OF CONFLICT OF INTEREST, YET THEY MADE 5 ORDERS AFTER BEING ADVISED. IT IS A VERY VERY SERIOUS VIOLAT ION AND OUR SYSTEM OF JUDGES AND JUSTICE ARE CORRUPT , LACK OF INTEGRITY, PATRONAGE, ILLEGALITY , BIAS, PREJUDICE PREVAIL . WE CAN NOT AFFORD NOR DO WE CONDONE THIS KIND OF JUSTICE.

MR. HOLDING URGES THE COURT TO UNEQUIVIOABLLY AND CATOGORICALLY TO AWARD THE PETITION AND JUDGMENT.

MR. HOLDING,S PETITION MEETS ALL THE CREDENTIALS AND SPECI AL REASONS THAT MEET ALL THE ELEMENTS OF RULE NO10.1 OF THIS COURT a. HAS SO FAR FOLLOWED THE ACCEPTED AND USUAL COURSE OF JUDICIAL PROCEEDINGS, BUT THE LOWER COURTS HAVE SO FAR DEPART ED FROM THE USUAL COURSE OF JUDICIAL PROCEEDINGS AND SANCTIONS, SUCH DEPARTURE BY THE LOWER COURTS, IN THE SUPREME COURT OF VIRGINIA AND THE CIRCUIT COURT OF WESTMORELAND COUNTY AS TO CALL FOR THE EXORCISE OF THIS COURT,S POWER OF SUPERVISION OF THIS COURT. WHEN THE JUSTICES KNOWINGLY , DELIBERATELY , INTENTIONALLY COMMITTED CONFLICT OF INTERESTS LAWS AND DUE PROCESS RIGHTS LAWS AND EVEN AFTER BEING CALLED TO THEIR ATTENTION PROCEEDED TO ISSUE 6 ORDERS AFTERWOOD IN UTTER DISREGARD OF [illegible] AND THE LAW

(b)THE SUPREME COURT OF VIRGINIA , STATE COURT DECIDED A FED ERAL QUESTION OF CONFLICT OF INTEREST AND DUE PROCESS LAWS, CERTAINLY NEEDS THE ATTENTION OF THE HIGH COURT . (c) THE CIR CUIT AND THE SUPREME COURT OF VA. AS SET FORTH IN ORDERS BEF ORE THIS COURT CERTAINLY SATISFY RULE 10, AND RULE 14.5 UNEQ UIVICABLY AND CATOGORICALLY .

THE DENIAL OF DUE PROCESS RIGHTS OF MR. HOLDING AND 6 OTHER QUESTIONS OF THE VIOLATIONS AND ERRORS FULLY SUPPORTED BY FAC TS AND LAW IN PLEADINGS AND OTHERWISE.

MR. HOLDING,S MOTION FOR JUDGMENT AND DAMAGES AND HIS AFFI DAVIT ON SEPTEMBER 3, 1991 PERFECTLY AND CLEARLY DRAFTED WITH NO PROBLEM IDENTIFYING THE SIGNIFICANCE AND CORRECTNESS WAS VE RY CLEARLY DONE.

JUSTICE ELIZABETH B. LACY AND ASSOCIATED JUSTICES COMPTON, JUSTICE POFF, AND CHIEF JUSTICE CARRICO FALLS WITHIN THE CON FINES OF AETNA LIFE INS CO. V. LAVOIE 475 U.S 813 (1986) ,BUT DOES NOT COME WITHIN THE CONFINES OF TUMEY V OHIO 273U.S. 510(1948) . JUSTICE LACY LEFT THE STATE CORPORATION COMMISSION OF VIRGINIA IN DECEMBER 31,1988. SHE JOINED THE SUPREME COURT OF VIRGINIA AS JUSTICE ON JANUARY 1, 1989 . THE PETITIONER HOLDING WAS INJURED BY THE DEFENDNNTSON SEPTEMBER 2, 1989 ONLY A FEW MONTHS AFTER SHE LEFT THE STATE CORPORATION OF VA. AND THE DEFENDANTS, BROTHERS, ZOECKLER, PARTHUM, SILVERMAN HER EMPLOYEES AT THE STATECORPORATION COMMISSION . .

IRREGARDLESS OF THE TIME FRAME JUSTICE LACY COMMITTED

AND THE ASSOCIATE JUSTICE, COMPTON, POFF, CARRICO COMFLICT OF INTEREST LAWS AND VIOLATED THEM AND ALSO VIOLATED THE DUE PROCESS LAWS OF MR. HOLDING,S .

JUSTICE LACY AND ASSOCIATE JUSTICE, COMPTON, POFF, CARRIC O VIOLATED THE JUDICAL CONDUCT LAWS, VIOLATED OATH OF OFFICE , VA.CODE SEC 49-1 (1989) , FAIRNESS, JUSTICE, IMPARTIALITY, AND SHOULD BE DISBARRED, FINED $500,000 , IMPRISONED FOR 30 YEARS WITH NO TIME OFF.

MR. HOLDING UNIEQUIVICABLE AND CATORGORICALLY DENY AS I REPEAT VIOLATION OF 14.5 OF THE RULES OF SUPREME COURT NO WAY. WHICH WAS SAID AND ENUMERATED EARLIER SEVERAL TIMES, REPETITI ON OF MS, PECK COUNSEL CAUSES THE REPITITION AND REDUCES THE BREVITY OF THE PETITION .

AGAIN , MS PECK COUNSEL FOR RESPONDANTS , BROTHERS ET AL FAILURE TO SEE BY HER LYING ABOUT CLEARNESS AND BREVITY, QUES TIONS FORTHE REVIEW PRESENTED, TOO NUMEROUS TO RECALL WANT MAKE IT SO. THE QUESTIONS FOR REVIEW ARE ALL VERY CLEAR AND CONCISELY PRESENTED AND THE FAILURE OF MS. PECK TO ADDRESS THE OTHER 6 QUESTIONS STANDS OUT FOR JUDGMENT TO MR. HOLDING.

THERE AGAIN MS. PECK COUNSEL FOR DEFENDANTS (RESPONDANTS) IS LYING STATING INACCURACIES ENVOLVED BY REFERENDE TO AND ARGUMENTS, CONCERING SEC 8.01-243 AND SEC 18.2 -499 AND 500 OF THE CODE . FORMER PERSONAL INJURIES NO MATTER WHAT THE THEORY MAY BE MUST BE BROUGHT WITHIN 2 YRS. FROM ACCRUSL DATE AND b. INJURY TO PROPERTY BROUGHT WITHIN 5 YRS FROM

SEC 18.2 -400 ,18.2-500 OF CODE IS CONSPIEACY . ACTION FOR INJURY BROUGHT WITHIN 5 YRS. OF VA.

MR. HOLDING HAS BEEN PERMAENTLY AND IRREPARABLE SUFFERED PERSONAL INJURIES ANF INJURIES TO PROPERTIES AND BUSINESSES, ESTATES, TRADES, INTEGRITY, CHARACTER , PERSONALTY BY THE CONPIRACY , CONDONE BY ALL, COLLUSION BY ALL , INTENTIONALLY, DEFINITELY BY THEIR WRONGFWL ACTS ON SEPTEMBER 2, 1989 .ASK FOR JUDGMENT.

REPLY BRIEF TO MADELINE T. WATTS OPPOSITION

MADELINE T. WATTS,S THE OTHER RESPONDANT JOHN W. WARE , COUN SEL. WATTS BRIEF IN OPPOSITION IS FALSE, ERRONEOUS, HALF TRUTHS, ITHOUT MERIT , WITHOUT FOUNDATION,BOLD FACE LYING BY HER COUNSEL JOHN W. WARE. THE CREDIBILITY IS QUESTIONABLE , THERE ARE NUM EROUS CLAIMS OF LYING AND PERJURY IN THE PAST AND FURTHER IN WATTS BRIEF OF OPPOSITION AND OTHER CIVIL ACTIONS WILL BE FILED. AS A RESULT,OF SAME.

ON PAGE 1 WARE WATTS COUNSEL STATES : THE AUGUST 14,1992 order of the Supreme COURT OF VIRGINIA , THE SEPTEMBER 18,1002 OF THE SUPREME COURT OF VA. ARE NOT REPORTED. MR. HOLDING WAS NOT NOTIFIED OR ADVISED AS ARE REQUIRED TO BE REPORTED , PR INTED , CODED , FILED FOR THE RECORD BY LAW , BY RULES OF SUP REME COURT , CONSTITUTION SO THEY ARE NUMBERED , EASILY BE LOCATED BY IDEX AO IF ONE WISHES TO APPEAL , OR REVIEW BE REDILY AVAILABLE. IT APPEARS THIS IS A DIRECT INTENTIONAL ATTEMPT TO CAST REFLECTIONS OR DEGRADE THE PETITION AND DEROG ATORY AGAINST MR. HOLDING WHICH HE TALES EXCEPTION .

ON PAGE ii TABLE OF CONTENTS WATTS COUNSEL WARE SAYS THE TRIAL COURT DID NOT DENY THE PETITIONER TRIAL BY JURY . HOL DING TAKE EXCEPTION AND SAYS UNEQUIVICALLY AND CATORIGORICA LY TRIAL BY JURY WAS DENIED IN THE TRIAL COURT , THOUGH IT WAS DEMANDED FROM THE BEGINNING ORALLY IN COURT AND BY MANY PLEADINGS AS GUARANTEED BY THE 7th AMENDMENT TO US CONSTIT UTION - WHERE THERE IS IN CONTROVERSET AT COMMON LAW SHALL EXCEE D TWENTY (20) DOLLARS , THE RIGHT TO TRIAL BY JURY. SHALL BE PRESERVED AND NO FACT TRIED BY JURY SHALL BE OTHERWISE BE REEX AMINED IN ANY COURT OF THE U.S THAN ACCORDANCE TO RULES OF COMMON LAW.

HOLDING TAKES EXCEPTION OF COUNSEL WARE STATEMENT JUSTICE LACY DID NOT HAVE A CONFLICT OF INTEREST PREVENTING HER FR OM RENDERING A FAIR TRIAL OF THE CASE. THIS IS ENTIRELY FALSE ERRONEOUS WITHOUT MERIT OR FOUNDATION. WITHOUT ANY BASES. .

JUSTICE ELIZABETH B. LACY CAME TO THE SUPREME COURT OF VIRGINIA ON JANUARY 1, 1989 AS JUSTICE FROM THE STATE CORP ORATION COMMISSION WHERE SHE WAS COMMISSIONER . SHE WAS AT THE STATE CORPORATION COMMISSION FROM 1985 UNTIL DECEMBER 31, 1988. THE RESPONDANTS-* BROTHERS , ZOECKLER , PARTHUM , SIL VERMAN WERE EMPLOYEES OF JUDGE LACY AND THE STATE CORPORATION COMMISSION .THE INJURIES COMPLAINED OF HAPPENED ON SEPTEMBER 2, 1989 A FEW MONTHS AFTER JUSTICE LACY LEFT THE COMMISSION. JUSTICE LACY WORKED WITH AND SUPERVISED THE RESPONDANTS BAILY. THEREFORE BY THIS ASSOCIATION JUSTICE LACY COMMITTED AND VIOL ATED THE CONFLICT OF LAWS AND DUE PROCESS RIGHT OF 14THAMEND

MENT TO US CONSTITUTION .

JUSTICE A. CHRISTINE COMPTON , JUSTICES RICHARD H. POFF, CHIEF JUSTICE/ CARRICO SITTING IN QUORUM AT A HEARING WITH JUSTICE LACY IN A HEARING AT THE SUPREME COURT OF VA. ON JULY 30, 1992 , JULY 29, 1992 , KNOWINGLY , DELIBERATELY , INTENTIONALLY AT THE HEARINGS AND MADE 6 ORDERS IN AUGUST 14,1992, SEPTEMBER 18,1992AFTER THEY WERE ADVISED THERE WAS A CONFLICT OF INTEREST AND VIOLATION OF DUE PROCESS THE COURT.CASE ON HEARING WAS HOLDING V BROTHERS ET AL AND WATTS.

LEWIS W. BROTHERS, JR. ET AL AND MADELINE T. WATTS DID-DEFIN ITELY , INTENTIONALLY , PLANNED IN COLLUSION A FULL BLOWN CON SPIRACY ON SEPTEMBER 2nd1989 COMMITTED THE ACT AS CHARGED BY THE AFFIDAVIT AND MOTION FOR JUDGMENT AND DAMAGES FILED ON SEPTEMBER 3, 1991. THE WRONGFUL ACTS OF THE RESPONDANTS DID PERMANENT IRREPARABLE PERSONAL INJURIES AS REVEILED IN THE ORIGINAL MOTION FOR JUDGMENT AND DAMAGES AND ORIGINAL AFFIDAVIT OF MR. HOLDING ON SEPTEMBER 3, 1991. AND HIS COMPANY.AND INJ URIES TO HIS BUSINESSES, PROPERTIES, TRADE, ESTATES, INTEGRITY CHARACTER IMPECCABLE AND SPOTLESS FOR 72 YEARS WITH 43 YRS OWNER AND OPERATOR OF AHIS BROKERAGE SECURITIES FIRM . WENT DOWN TO COMMONWEALTH ATTORNEY OF ESSEX COUNTY AT TAPPAHANOCK AND TO LIEUTENANT SS CLRK OF SHERIFF DEPT HAD MR. HOLDING ARRESTED ON $10,000 FELONEY EMBEZZLEMENT CHARGE. MR. HOLDING WAS IN THE HOSPITAL WITH HEART TROUBLE AND STRANGLING HERNIA OPERATION. THE CHARGE WAS DISMISSED ON RECOMMENDATION OF COM

MONWEALTH ATTORNEY GARRATT BY JUDGE HYDE OF THE GENERAL DISTRICT COURT ON JANUARY 11, 1990 .

SANCTIONS GRANTED BY THE TRIAL JUDGE WERE ERRONEOUS , WITHOUT MERIT, WITHOUT TRUTH, OR FOUNDATION , NOT JUSTIFIED CONTRARY TO LAW AND ORDER AS TO SEC 8.01-271.1 PLEADING IN GENERAL . WARE COUNSEL FOR WATTS MADE THE SAME PLEADING OF SEC. 8.01-2711 ON 12/12/91 RECEIVED FALSELY $250 1/6/92, 3/6/92 RECEIVED $500 ILLEGALLY , WRONGFULLY .

JOHN W. WARE , COUNSEL FOR WATTS CRIMINAL RECORDS , , CONVICTIONS, MEDICAL HISTORY , EDUCATION ARE NOT INCLUDED IN THIS REPORT.

WATTS COUNSEL JOHN W. WARE FALSE STATEMENT THAT HOLDING ATTEMPTS TO INTRODUCE EVIDENCE NOT A PART OF THE RECORD MIS LEADING AND INACCURATE IS A BOLD FACED LIE BY WARE AGAIN TRYING HIS LYING TO WIN NO BASIS WHATSOEVER . . THE EVIDENCE SUBMITTED IS UNEQUIVIBLY , CATOGORICALLY TRUE.

MR. HOLDING VERY CLEARLY AND CONCISELY SETS FORTH IN HIS MOTION FOR JUDGMENT AND DAMAGES AND HIS AFFIDAVIT THE INTENTIONAL , DELIBERATE PLANNED CONSPIRACY WITH C OLLUSION CONSPIRACY OF THE RESPONDANTS DID PRODUCE PERMANENT IRREPARABLE PERSONAL INJURIES AND INJURIES TO HIS BUSINESS PROPERTIES, ESTATES, TRADE WHICH CAN NEVER BE FIXED OR CURED. AND SUFFERINGS.

MRS. WATTS DID MAKE A STATEMENT UNDER OATH CHARGING MR. HOLDING WITH EMBEZZLEMENT TO IT SO CLAIMS

AND COMMONWEALTH ATTORNEY GARRATT ACCOMPANYED BY PARTHUM, AND SILVERMAN IS ON RECORD.SIGNED STATEMENT NOTORIZED BY PARTHUM AND SILVERMAN .

THE TRIAL JUDGE REFUSED TO SIGN THE STATEMENT FOR THE RECORD BECAUSE IT WAS RECEIVED ON 2/6/92 WHICH WAS DUE 2/5/92 THE RESONS WHY WAS,MR. HOLDING HAD BEEN SICK WITH BAD CASE OF FLU FOR 3 WEEKS , THE WEATHER WAS FRIDIG , THE DOCTORS ORDERS WERE TO NOT GO OUT IN THE FRIDIG COLD WIRH HITH THE FLU AND ACUTE HEART TROUBLE. SO MR. HOLDING MAILED YJE STATEMENT IN ON THE 2/5/92.THE TRIAL JUDGE NEVER READ THE STAEMENT AND DIDN,T KNOW WHY I WAS BEFORE THE COURT ON 2/20/92 AND HE HAD 2 LARGE CASES , CRIMINAL AND CIVIL AND SANDWICHED ME IN DURING RECESS.

MR. HOLDING PETITION MEETS ALL THE "SPECIAL AND IMPORTANT, REASONS" STANDARDS ENUNERATED IN RULE 10.1 OF THE RILES OF THE SUPREME COURT.AND THE PETITION SHOULD BE GRANTED AND JUDGMENT.

THE DUE PROCESS RIGHTS WERE VIOLATED IN THE TRIAL CORRECT MANY TIME AS ENUMERATED AND IN THE SUPREME COURT OF VA.

MR.HOLDING RAISES SEVERAL FEDERAL QUESTIONS OF WHICH ARE VERY VERY IMPORTANT LIKE JURY TRIAL , CONFLICT OF INTEREST AND SO FORTH .

WARE HAS LIED SO MANY TIMES HE HS FORGOT WHAT HE HAS LIED ABOUT AND I HAVE LOST THE COUNT.

THIS CASE IS A DELIBERATE, INTENTIONAL , WITHOUT REMORSE

OR CONCERN AS TO HOW MUCH INJURIES MR. HOLDING SUSTAINED. OR THE COLD BLOODED MANNER OF A PLANNED CONSPIRACY WITH COL LUSION FULL BLOWN AND WHEN ASKED WHY THEY DID IT REPLIED THAT ,S WHAT THEY WERE SUPPOSED TO DO WITH ARROGENCE , AND LAUGHING WHILE MR. HOLDING WAS IN THE HOSPITAL FOR AN OPERATION AND HEART TROUBLE. THE DELIBERATE , INTENTIONAL , WRONGFUL ACTS OF THE RESPONDANTS INFLICTED PERMANENT , IRREPARABLE PERSONAL INJURIES AND INJURIES TO PROPERTIES, BUSINESSES, TRADE, ESTATES, INTEGRITY, CHARACTER WHICH HAS BEEN IMPECCABLE AND SPOT LESS. INJURIES THAT CAN NEVER BE FIXED OR REPAIRED.

HOLDING IS ENTITLED TO APPROVAL OF THE PETITION AND JUDGMENT.

MR. HOLDING HAS SUFFERED GREAT INJURIEIS BITH PERSONAL AN ND TO HIS PROPERTIES AT THE HANDS OF THE RESPONDANTS AND THEY DONT CARE .

CONFLICT OF INTEREST AND DUE PROCESS WERE VIOLATED IN THE SUPREME COURT OF VA, BY JUSTICE LACY , JUSTICE COMPTON , JUSTICE POFF, CHIEF JUSTICE CARRICO . 14th AMNEDMENT.

VIOLATION OF TRIAL BY JURY 7th AMENDMENT .

VIOLATION OF PREJUDICE , BIAS , , INJUSTICE IN THE TRIAL COURT AND DUE PROCESS RIGHTS. .

THE RECORD SPEALS VERY LOUDLY AND TRUTHFULLY, THE INJUST ICE DONE MR. HOLDING INTENTIONATELY AND DELIBERATELY.

THE PETITION SHOULD BE APPROVED WITH JUDGMENT.

REPECTFULLY SUBMITTED,

Clarence Houston Holding

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CERTIFICATE OF SERVICE

I CERTIFY I SENT POSTAGE PAID FIRST CLASS COPIES OF THE REPLY BRIEF ON FEBRUARY 8,1993.

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